

MEMO ENDORSED



THE CITY OF NEW YORK
LAW DEPARTMENT
100 CHURCH STREET
NEW YORK, NY 10007

HON. SYLVIA O. HINDS-RADIX
Corporation Counsel

DAVID S. THAYER
Assistant Corporation Counsel
t: (212) 356-2649
f: (212) 356-1148
e: dthayer@law.nyc.gov

May 19, 2023

Via ECF

The Honorable Andrew L. Carter, Jr.
United States District Court for the
Southern District of New York
40 Foley Square
New York, NY 10007

Re: J.F., et al. v. Adams, et al., No. 21 CV 11150 (ALC)

Dear Judge Carter:

I am an Assistant Corporation Counsel in the Office of the Corporation Counsel of the City of New York, the Honorable Sylvia O. Hinds-Radix, attorney for Defendants Mayor Adams, the City of New York, Chancellor David C. Banks, the New York City Department of Education, the New York City Board of Education of the City School District of the City of New York, Commissioner Asim Rehman, and the New York City Office of Administrative Trials and Hearings (collectively, "City Defendants") in the above-referenced action.

With the consent of Plaintiffs' counsel, I write to respectfully request a 2-week extension of the briefing schedule on Defendants' motions to dismiss. The requested extension is necessary due to the fact that, having recently received the identities of the Plaintiffs, my colleagues at the New York City Department of Education continue to collect documents and information for my review and consideration in connection with City Defendants' motion to dismiss. However, this process has, in the last two weeks, been hampered by medical issues which have required my frequent absence from work.

The requested 2-week extension would alter the motion briefing schedule as follows:

Deadline	Current Date	Proposed Date
City Defendants to serve their motion to dismiss	May 22, 2023	June 5, 2023
Plaintiffs to respond to all Defendants motions	June 26, 2023	July 10, 2023
All Defendants to serve their replies, if any	August 4, 2023	August 18, 2023

This is the first request by City Defendants for an extension of the aforementioned briefing schedule in the time since the Court adopted the parties' updated briefing schedule after their execution of a protective order and confidentiality agreement. (ECF No. 112.) City Defendants once previously sought an extension of the original briefing schedule in connection with their demand for Plaintiffs' identities. (ECF No. 100.) As noted, Plaintiffs' counsel has graciously consented to the instant request. The State Defendants have not indicated their position on this application, but given the impending City Defendants' deadline, I file this without the benefit of their response.

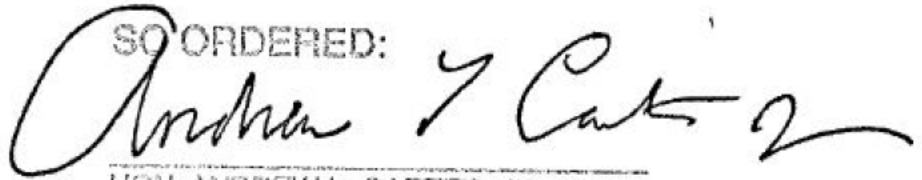
I thank the Court for its consideration of this matter.

Respectfully yours,

/s/ David S. Thayer

David S. Thayer

cc: *Via ECF*
All counsel of record

SO ORDERED:

 HON. ANDREW L. CARTER, JR.
 UNITED STATES DISTRICT JUDGE

Dated: May 22, 2023
 New York, NY